



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

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June 1, 2016

Mr. Michael Cocco  
Operations Manager  
Eastern Etching & Manufacturing  
35 Lower Grape Street  
Chicopee, MA 01013

**RE: Chicopee**  
Transmittal No.: X267449  
Application No.: WE-16-007  
Class: *OP*  
FMF No.: 130560  
**AIR QUALITY PLAN APPROVAL**

Dear Mr. Cocco:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Waste Prevention, has reviewed your Limited Plan Application ("Application") listed above. This Application concerns the proposed installation of a new silkscreen machine at your etching and manufacturing facility located at 35 Lower Grape Street in Chicopee, Massachusetts ("Facility").

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control," regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-O, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

## 1. **DESCRIPTION OF FACILITY AND APPLICATION**

Eastern Etching (the “Facility”) is a manufacturer of metal nameplates, decals, and labels. Large metal sheets are printed using various methods. Once printed, the metal sheets are cut down to final size per customer request. In addition, the Facility uses the silk screen process to place designs onto plastic substrates.

In this instance, the Facility proposes to replace, one of the silk screening machines. The application, submitted pursuant to 310 CMR 7.02(4) reveals that: production rates, ink types applied, ink application volume, clean-up parameters and clean-up solvents and best management practices for the new unit, are all identical to those used in conjunction with the unit being replaced. Additional information, received by MassDEP on April 5, 2016, details how the unit complies with Best Available Control Technologies (“BACT”) located in Table 2 below. Following issuance of the Plan Approval on May 11, 2016, MassDEP received a request from the Facility to revise certain operating parameters and material categorizations, differing from those included in the original application, which would recognize the projected growth of the business. Those revisions are the basis for the re-issuance of this Plan Approval.

Currently, the Facility contains no air pollution control devices and therefore is not subject to 40 CFR part 64, Compliance Assurance Monitoring standards.

The Facility’s current Operating Permit (#1-O-07-010) places a facility-wide emission cap of less than ten (10) tons per year (“tpy”) for any single Hazardous Air Pollutant (“HAP”) and less than twenty-five (25) tpy for combined HAP’s. Three (3) MassDEP permits contain use and operational limitations with regards to the silk screening process: #1-P-96-020 places an annual limit on VOC emissions to 9000 pounds per year; #1-P-96-021 limits the amount of substrate processed per year to 612,200,000 square inches and #1-P-01-027 limits the VOC content of acid resistant coatings to less than ten (10) pounds VOC per gallon of solids.

This Limited Plan Approval has no effect on the total facility output of pollutants and has no effect or change to existing permits or approvals; it merely recognizes the removal of Emission Unit #11 and approves the installation of Emission Unit # 38.

### **EMISSION UNIT (EU) IDENTIFICATION**

Each Emission Unit (“EU”) identified in Table 1 is subject to and regulated by this Plan Approval:

<b>Table 1</b>			
<b>EU#</b>	<b>Description</b>	<b>Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
38	silk screen table	612, 200,000 square inches of substrate coated per year	none

**Table 1 Key:** EU# = Emission Unit Number

PCD = Pollution Control Device

## 2. APPLICABLE REQUIREMENTS

### A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2 below:

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
38	<ol style="list-style-type: none"> <li>612,200,000 square inches of substrate coated per year.</li> <li>2,009 gallons of coating applied per year.</li> <li>Coatings shall contain no more than 4.5 pounds of VOC per gallon, as applied.</li> <li>No more than 240 gallons of thinners and cleaning solvents per year.</li> <li>Coatings used in small amounts on EU 38 are exempt from the VOC content emission limitations specified in condition #3, Table 2 herein only if the total amount of all coatings exempted does not exceed 55 gallons in any year.</li> </ol>	<p>VOC</p> <p>HAP(i) (individual HAP) HAP(t) (total HAP)</p>	<p>VOC: less than 9000 pounds per year</p> <p>HAP(i) less than 0.98 tpy HAP(t) less than 1.8 tpy</p>

<b>Table 2</b>			
<b>EU#</b>	<b>Operational / Production Limit</b>	<b>Air Contaminant</b>	<b>Emission Limit</b>
EU 10, 37, 38	6. 612,200,000 square inches of substrate coated per year.	VOC	VOC: less than 9000 pounds per year
	7. 2,009 gallons of coating applied per year.	HAP(i) (individual HAP) HAP(t) (total HAP)	HAP(i) less than 0.98 tpy HAP(t) less than 1.8 tpy
	8. Coatings shall have no more than 4.5 pounds per gallon VOC.		
	9. No more than 240 gallons of thinners and cleaning solvents per year.		

**Table 2 Key:**

EU# = Emission Unit Number

HAP(i) = maximum individual Hazardous Air Pollutant

HAP(t) = total Hazardous Air Pollutants

YEAR = any 12 consecutive month period

VOC = Volatile Organic Compounds

TPY = tons per year

**B. COMPLIANCE DEMONSTRATION**

The Permittee, although not operating any Pollution Control Devices (“PCDs”) at the Facility with regards to Emission Unit #38 or other parts of the silkscreen operation, is subject to, and shall comply with, the following monitoring, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

<b>Table 3</b>	
<b>EU#</b>	<b>Monitoring and Testing Requirements</b>
38	1. The Permittee shall monitor the coating usage and production of the silkscreen operations.
	2. The Permittee shall monitor the daily use of coatings in the silk screen operation.
	3. The Permittee shall monitor the daily production of the silk screen operation.
	4. The Permittee shall monitor the employee implementation of the BMP’s and SOMP’s once every 180 days to ensure that they are performed as described in the Application and supporting documents and institute a re-training program to ensure proper implementation by employees.
EU 10, 37, 38	5. The Permittee shall monitor all silkscreen operations to ensure sufficient information is being collected and documented in order to be available to comply with 310 CMR 7.12 Source Registration.
	6. The Permittee shall monitor the VOC and HAP content of all products used in the silkscreen operation including but not limited to: coatings, diluents and cleaning solvents.

**Table 3 Key:**

EU# = Emission Unit Number

BMP = Best Management Practices

VOC = Volatile Organic Compounds

SOMP = Standard Operating and Maintenance Procedure

HAP = Hazardous Air Pollutant

**Table 4**

EU#	Record Keeping Requirements
38	<ol style="list-style-type: none"> <li>1. The Permittee shall maintain daily records sufficient to demonstrate compliance with the 9000 pounds per year VOC emission limit and the 612,200,000 square inches of substrate production limits, per each 12 consecutive month period, as specified herein and in other approvals.</li> <li>2. The Permittee shall track records of the identity, quantity, formulation, solids content and density of inks and coatings used.</li> <li>3. The Permittee shall daily track records of the identity, quantity, formulation (including HAPs) and density of all diluents and clean-up solvent used. All solvents and clean up operations are to be performed in accordance with BMP's for solvent management provided in the application and additional documents attached thereto.</li> <li>4. The Permittee shall keep a written record of the number of times employees did not follow the exact BMP's and SOMP's and received re-training on the proper implementation thereof.</li> <li>5. The Permittee shall track records of the actual quantity of product produced and the actual amounts of inks, coatings, thinners and solvents used.</li> <li>6. The Permittee shall maintain the following records for coatings which have a VOC content in excess of the limitation specified in Table 2, condition #3 herein: <ol style="list-style-type: none"> <li>a. The identity and VOC content of each coating used in EU 38.</li> <li>b. The amount, in gallons, of each coating used in EU 38 during each month and each 12 consecutive month period.</li> <li>c. The total amount, in gallons, of all coatings used during each month and each 12 consecutive month period.</li> </ol> </li> </ol>
EU 10, 37, 38	<ol style="list-style-type: none"> <li>7. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15<sup>th</sup> day following each month.</li> <li>8. The Permittee shall maintain records of monitoring and testing as required by Table 3.</li> <li>9. The Permittee shall maintain a copy of this Plan Approval, underlying Application and supplemental information submitted to support said Application, and the most up-to-date SOMP for the EU approved herein on-site. These records shall be maintained together for MassDEP's on site review.</li> <li>10. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.</li> <li>11. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.</li> </ol>

<b>Table 4</b>	
<b>EU#</b>	<b>Record Keeping Requirements</b>
	12. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	13. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

**Table 4 Key:**

EU# = Emission Unit Number

BMP = Best Management Practices

SOMP = Standard Operating and Maintenance Procedure

USEPA = United States Environmental Protection Agency

<b>Table 5</b>	
<b>EU#</b>	<b>Reporting Requirements</b>
38	1. The Permittee shall notify MassDEP in writing within fifteen (15) working days of any changes in BMP's or SOMP's for the silk screen operation compared to those stated in the Application and used as the basis for this Approval, if such change will result in higher emissions of VOC.
	2. The Permittee shall notify MassDEP in writing within fifteen (15) working days of any changes in inventory accounting procedures or the mass balance calculations used to obtain the VOC and HAP emission factors used as the basis for this Approval.
	3. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
EU 10, 37, 38	4. The Permittee shall notify the Western Regional Office of MassDEP, BAW Permit Section Chief by telephone: 413-755-2115, email: Marc.Simpson@state.ma.us or fax: 413-784-1149, as soon as possible, but no later than three (3) business day after discovery of an exceedance(s) of Table 2. A written report shall be submitted to Permit Section Chief at MassDEP within ten (10) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	5. The Permittee shall report annually to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval. Pursuant to 7.12(1)(a)7., the Permittee is required to file Source Registration as a condition of this Plan Approval.
	6. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.

**Table 5 Key:**

EU# = Emission Unit Number

SOMP=Standard Operating and Maintenance Procedure

VOC= Volatile Organic Compound

HAP=Hazardous Air Pollutant

BMP=Best Management Practice

BAW=Bureau of Air and Waste

#### 4. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to, and shall comply with, the following special terms and conditions:

A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	Special Terms and Conditions
38	<p>1. The Permittee shall evaluate the SOMP's and BMP's on an annual basis to ensure that they meet or exceed the best available industry standards and work practices to limit emissions. Such work practices include but are not limited to:</p> <ul style="list-style-type: none"> <li>a. Store all VOC and/or HAP-containing coatings, process-related waste materials and VOC and/or HAP-containing materials in closed containers;</li> <li>b. ensure that mixing and storage containers used for VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials are kept closed at all times except when depositing or removing these materials;</li> <li>c. minimize spills of VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials;</li> <li>d. convey VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials from one location to another in closed containers or pipes;</li> <li>e. minimize VOC and/or HAP emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that: <ul style="list-style-type: none"> <li>i. equipment cleaning is performed without atomizing the cleanup solvent; and,</li> <li>ii. all spent solvent is captured in closed containers; and</li> </ul> </li> <li>f. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing coatings, process-related waste materials, or VOC and/or HAP-containing materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container.</li> </ul>
	<p>2. The Permittee shall, at least annually, evaluate the coatings and solvents available on the marketplace to ensure that the Facility is using the products with the lowest possible VOC and HAP content without affecting product output or quality.</p>
	<p>3. The Permittee may make the approved changes herein, upon the submittal and receipt by MassDEP of a BWP AQ 10 Operating Permit Minor Modification application pursuant to 310 CMR 7.00 Appendix C(8)(d)3.</p>
EU 10, 37, 38	<p>4. The Permittee shall include the volume of coatings, solvents and diluents resulting from spills in the VOC and HAP emission calculations.</p>
	<p>5. Any prior Plan Approvals issued under 310 CMR 7.02 shall remain in effect unless specifically changed or superseded by this Plan Approval. The Facility shall not exceed the emission limits and shall comply with approved conditions specified in the prior Plan Approval(s) unless specifically altered by this Plan Approval.</p>

**Table 6 Key:** BMP=Best Management Practice    EU# = Emission Unit Number    HAP=Hazardous Air Pollutant  
SOMP=Standard Operating and Maintenance Procedure    VOC= Volatile Organic Compound

- B. The Facility has no stacks associated with any of the emission units performing silk screening operations.

## **5. GENERAL CONDITIONS**

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.



- J. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
- K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

## **6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT**

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain “Fail-Safe Provisions,” which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

## **7. APPEAL PROCESS**

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts  
Department of Environmental Protection  
P.O. Box 4062  
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Bob Shultz by telephone at 413-755-2210, or in writing at the letterhead address.

Date: June 1, 2016

This final document copy is being provided to you electronically by the  
Department of Environmental Protection. A signed copy of this document  
is on file at the DEP office listed on the letterhead.

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Marc Simpson  
Permit Section Chief  
Bureau of Air and Waste  
Western Region

ecc: Marc Simpson, Christine LeBel, Peter Czapienski-DEP/WERO; Yi Tian-MassDEP/Boston  
Michael Cocco - [mcocco@eastern-etching.com](mailto:mcocco@eastern-etching.com), Hamilton Hackney - [HackneyHa@gtlaw.com](mailto:HackneyHa@gtlaw.com),  
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